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PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Application of	)	
	)	
Applicants: James Benjamin Williams et al.	)	
	)	Examiner
Serial No. 10/797,889	)	Thu Thao Haven
	)	
Filed: March 10, 2004	)	Art Unit 3624
	)	
Title: Methods for issuing, distributing, managing and	)	
redeeming investment instruments providing	)	
securitized annuity options	)	

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

FAX TRANSMISSION COVER LETTER  
- 13 SHEETS TOTAL -

The attached Response to Final Rejection and Request for Advisory Action (12 pages) is being transmitted via facsimile to the central facsimile number of United States Patent and Trademark Office, (571) 273-8300, on January 27, 2006.

Respectfully submitted,



Dated: January 27, 2006

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Dear Sir:

**Response to Final Rejection and Request for Advisory Action**

**Status of this application**

Claims 1-13 and 15-22 are pending (because of an initial claim numbering error, no claim number 14 was ever submitted). In the Office Action mailed on January 11<sup>th</sup>, the Examiner finally rejected all claims based on the previously cited Lewis et al. Patent 6,611,815 (hereinafter "Lewis"). This response is being transmitted to the Office within two months of the mailing date of the outstanding final rejection, and requests an advisory action.

**Response to the Final Rejection**

In the outstanding final rejection, the Examiner found that "*Applicant's arguments filed October 28, 2005 have been fully considered but they are not persuasive.*" The Examiner made specific comments concerning those prior arguments in paragraphs A) and B), and those comments are reproduced below in *italics*, followed by applicant's responsive remarks. Paragraph A states: